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January 19, 2021

Via ECF

Judge Denis R. Hurley
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *SHHA, LLC v. Opal Holdings LLC et al.*
Case No. 2:20-cv-03574-DRH-AYS

Dear Judge Hurley,

We represent defendants Holman Funding Group, Inc. and Chaim Holman (collectively, "Holman") in the above-referenced matter.

Pursuant to our conference with your law clerk on December 12, 2020, we write to advise Your Honor that we will be filing a motion to dismiss Plaintiff's Second Amended Complaint.

We understand that Holman's motion papers must be served on opposing counsel by February 19, 2021, Plaintiff's opposition papers must be served on us by March 19, 2021, and that Holman's reply papers must be served on opposing counsel by April 2, 2021. We will file and provide Your Honor with a complete set of the motion papers once our motion is fully-briefed.

Respectfully submitted,

/s/ David E. Miller, Esq.

cc: Leo Jacobs, Esq.
Eduard Kushmakov, Esq.
Jacobs PC
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